

## EXHIBIT G

Confidential - Subject to Stipulation and Order of Confidentiality

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2 :SUPERIOR COURT OF  
:NEW JERSEY  
3 IN RE: :LAW DIVISION -  
PELVIC MESH/GYNECARE :ATLANTIC COUNTY  
4 LITIGATION :  
:MASTER CASE 6341-10  
5 :  
:CASE NO. 291 CT

6  
CONFIDENTIAL-SUBJECT TO STIPULATION AND ORDER OF  
7 CONFIDENTIALITY

8 - - -  
9 May 18, 2012

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11 Transcript of the deposition of  
12 SEAN M. O'BRYAN, called for Videotaped  
13 Examination in the above-captioned matter, said  
14 deposition taken pursuant to Superior Court Rules  
15 of Practice and Procedure by and before Maryellen  
16 Coughlin, a Certified Realtime Reporter,  
17 Registered Professional Reporter, and Notary  
18 Public for the Commonwealth of Massachusetts, at  
19 the offices of Campbell Campbell Edwards &  
20 Conroy, P.C., One Constitution Center, 3rd Floor,  
21 Boston, Massachusetts, commencing at 10:05 a.m.

22 - - -  
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24  
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1 warnings that a patient could be faced with that  
2 are important for the patient.

3 Q. And to the extent you had input  
4 into the Prolift® IFU drafting process, you  
5 certainly wanted to make sure that any warnings  
6 of any significant potential risks would be  
7 explicitly communicated to the intended or  
8 foreseeable users of the Prolift®, correct?

9 MS. KABBASH: Objection.

10 A. Sure. I rely on the medical team  
11 to tell me what is significant and what is  
12 important to convey into the instructions for  
13 use, package insert.

14 Q. When you worked on that project, it  
15 was your understanding from an FDA regulatory  
16 perspective it would not be legitimate to not  
17 include warnings of potentially significant  
18 adverse events based on a decision that the  
19 surgeons would figure that out on their own?

20 MS. KABBASH: Objection.

21 A. No, that's correct.

22 Q. Would you turn to Page 22, please.  
23 It's Paragraph D, D.1.3. The question is asked,  
24 "Do the results of the design validation  
25 performed as a result of this change in materials

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1 A. Yes, yes.

2 Q. Do you know if those were done by  
3 the TVM or the Prolift® procedure or by other  
4 procedures?

5 A. I can't recall. I'm sorry.

6 Q. You were asked by counsel about  
7 whether or not it was your responsibility to make  
8 sure adverse events were properly communicated in  
9 the IFU, and I think you said your responsibility  
10 to make sure that once medical affairs decided  
11 that those adverse events belonged, were  
12 significant enough that they needed to be  
13 communicated because they were risks associated  
14 with the Prolift®, you want to make sure that it  
15 would not be presented in a confusing way,  
16 correct?

17 A. Yes.

18 Q. And part of that would be that if  
19 such a risk was known and was going -- rephrase.

20 And part of that would be that  
21 if -- rephrase.

22 This is the last question of the  
23 day. And part of that review that you're talking  
24 about would include making sure that, to the  
25 extent a risk did need to be included in the IFU,

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1       because, as you said, if it's known by medical  
2       affairs to be a risk connected to the Prolift® it  
3       should be in there, you don't want it to be  
4       presented in a confusing way, and you want it to  
5       be explicitly and clearly set forth, correct?

6                       MS. KABBASH: Objection.

7               A.       That's a fair assessment, yeah.

8                       MR. SLATER: No other questions.

9                       MS. KABBASH: I think we're done.

10                      THE VIDEOGRAPHER: Person on the  
11       phone any questions?

12                      This concludes the May 18th, 2012,  
13       deposition of Sean M. O'Bryan. The number of  
14       tapes used today was 3. We are off the record at  
15       4:59 p.m.

16                      (Deposition suspended/concluded  
17                      at 4:59 p.m.)

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